

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION

Andrew Hayes,

Plaintiff,

v.

St. Matthews Police Department and
Michael Smalls, Jr., individually,

Defendants.

C.A. No. 5:15-cv-4486-JMC

**JOINT RULE 26(f) DISCOVERY
PLAN OF THE PARTIES**

The parties having conferred as directed by the Court in its Conference and Scheduling Order filed **November 30, 2015**, propose the following pursuant to Rule 26(f), Fed. R. Civ. P.:

1. The parties have agreed to waive the disclosures required by Rule 26(a)(1) and to pursue such information through ordinary discovery.
2. The parties anticipate the need for discovery on both liability and damages and believe that discovery can be completed by the deadline in the Conference and Scheduling Order.
3. The parties do not believe that any change in the limitations on discovery imposed under the Federal Rules of Civil Procedure or local rules is necessary at this time.
4. The parties are not aware of any other orders under Rule 26(c) or Rule 16(b) and (c) that are necessary or appropriate at this time.

s/Timothy O. Lewis

ALLAN R. HOLMES (FID 1925)
TIMOTHY O. LEWIS (FID 9864)
GIBBS & HOLMES
171 Church St., Suite 110
Charleston, SC 29401
Tel.: (843) 722-0033
Fax: (843) 722-0114

s/Christopher W. Johnson

DERWOOD L. AYDLETTE (FID 5036)
CHRISTOPHER W. JOHNSON (FID 7581)
GIGNILLIAT, SAVITZ & BETTIS, L.L.P.
900 Elmwood Ave., Suite 100
Columbia, SC 29201
Tel.: (803) 799-9311
Fax: (803) 254-6951

aholmes@gibbs-holmes.com
timolewis@gibbs-holmes.com

ATTORNEYS FOR PLAINTIFF

daydlette@gsblaw.net
cjohnson@gsblaw.net

ATTORNEYS FOR DEFENDANTS